

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD—
LOS ANGELES REGION

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September 29, 1989

Robert M. Walter
TRW, Inc.
Executive Offices
Office of Chief Counsel
1900 Richmond Road
Cleveland, Ohio 44124

Charles M. Miller
C. M. Miller Enterprises
20415 Prestina Way
Walnut, CA 91789

AMENDED CLEANUP AND ABATEMENT ORDER 88-057

Cleanup and Abatement Order 88-057, dated May 12, 1988, directed that a comprehensive investigation be performed at the facility located at 18301 East Arenth Avenue in the City of Industry to determine the full extent of any soil and ground water contamination, to take appropriate remedial action for both soil and ground water and to submit technical results of efforts according to the schedule provided.

This Order is being amended to reflect the addition of TRW, Inc., to the Order, to clarify the Monadnock Company entities and to modify the time schedule.

Failure to comply with the requirements of this Order may result in enforcement actions. Direct all technical and schedule questions to Philip Chandler at (213) 266-7537.

A handwritten signature in cursive script, appearing to read 'Robert P. Ghirelli'.

ROBERT P. GHIRELLI, D.Env.
Executive Officer

PBC:pag

See attached mailing list.

MONADNOCK COMPANY MAILING LIST

cc: Bonnie Wolstoncroft, Office of Chief Counsel, State Water
Resources Control Board
Jennifer Soloway, Office of Chief Counsel, State Water
Resources Control Board
✓ Neil Ziemba, Environmental Protection Agency, Region 9,
Toxics & Waste Management Division
Dennis Dickerson, Department of Health Services,
Toxics Substances Control Division
Bill Jones, Los Angeles County, Department of Health Services,
Hazardous Materials Program
Don Howard, Engineer for Puente Basin Water Master
Thomas Stetson, Engineer for Main San Gabriel Basin
Watermaster
Joseph Kwan, TRW, Inc.
Martin R. Cohen, The Monadnock Company
Ralph Wagner, Consulting Engineer
Richard Ross, Parker, Milliken, Clark, O'Hara and Samuelian
Douglas Beck, Tuttle & Taylor, Inc.

STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

AMENDED CLEANUP AND ABATEMENT ORDER

ORDER NO. 88-057

Cleanup and Abatement Order No. 88-057 Requiring TRW, Inc., Charles M. Miller, C. M. Miller Enterprises and The Monadnock Company (as described below) to Cleanup and Abate the Effects of Contaminants Discharged to Soil and Ground Water

The California Regional Water Quality Control Board, Los Angeles Region, finds that:

1. In January 1966, Cinch-Monadnock Division of United Carr relocated its Hayward California plant to 18301 East Areneh Avenue in the City of Industry (hereafter the "site"). United Carr merged into TRW, Inc. in 1969-70. TRW, Inc. continued to run and operate the plant until October 1980 when it sold the plant and business to The Monadnock Company. Charles M. Miller was the sole shareholder of The Monadnock Company and was also the manager of the plant from 1967-1980.

In October, 1987 The Monadnock Company sold all its operating assets and business to HCH Acquisition Corporation. The Monadnock Company (also herein known as the "Old Monadnock Company") changed its name to C.M. Miller Enterprises, Inc.. HCH Acquisition Corporation changed its name to The Monadnock Company (also herein known as the "New Monadnock Company. C.M. Miller owns the site and leases it to the New Monadnock Company.

2. The facility manufactures small parts and fasteners for the aerospace industry using industrial processes such as degreasing, heat treating and plating. Volatile organic compounds (VOCs), metals, and other chemicals were/are used.
3. Discharges of solvents and other chemicals occurred at the site. This finding is based on the following:
 - a) Subsequent to the move from Hayward to the City of Industry, equipment was cleaned at the site. Former employees of United Carr and TRW, Inc. have stated under oath that this equipment was steam cleaned using various solvents. This cleaning was done at the site, on the ground outside the building. The cleaning took place over a two to three week period beginning in January 1966 using significant quantities of solvents. The ground where the cleaning was done became very wet.

- b) A former employee of United Carr stated that used chemicals from the manufacturing process were occasionally disposed of by dumping on the ground at the site.
- c) The facility used large quantities of solvents in the manufacturing process. The facility purchased up to 30 barrels per month during the late 1960's. The barrels were stored in outside barrel areas. The facility continued to use solvents until August 1988. Barrels of liquid chemicals were stored externally until recently. In the general experience of the Regional Board, such storage has led to unpermitted discharges through such actions as spillage during transfer of contents, puncturing while being transported, exposure to rain and leaking as a result of improper storage or weathering.
- d) The facility has a system of below-grade sumps, drains, piping and an industrial waste clarifier. Heat treating, plating and degreasing have contributed to the waste stream through this system. In the general experience of the Regional Board such systems are frequently conduits of waste to ground.
- e) Industry-wide handling practices of solvents have historically been inadequate to prevent discharges to ground.
- f) A December 15, 1978 letter from TRW, Inc. to the City of Industry describes a trench system to handle spillage of toxic chemicals. The letter was written in response to a cited violation.
- g) An August 15, 1986 report by Dames and Moore, prepared for The Monadnock Company and B.F. Goodrich Company, concluded that contamination encountered in boring(s) in the unpaved area south of the main plant building were related to former leakage/spillage of drums which are/were stored nearby. It additionally described a debris pile along the paved/unpaved parcel boundary to the east of the barrel storage area which contained cadmium, zinc, lead, and cyanide at sufficiently high levels to result in recommendations for disposal of it and underlying soils as hazardous waste.

4. For the purposes of this order, the following parties are also referred to as dischargers: TRW, Inc., The Monadnock Company ("Old Monadnock Company"), Charles M. Miller and C.M. Miller Enterprises, Inc.. The Monadnock Company ("New Monadnock Company") has stated that it has not discharged any solvents as part of its operation. The New Monadnock Company will be submitting for Regional Board review a report setting forth its activities on the site.
5. The site is within the Puente Ground Water Basin, which contains permeable sediments having a historic safe yield of 4,400 acre-feet/year. The basin is adjudicated and according to the Basin Plan (1978 revision) water from it is beneficially used for municipal, domestic, industrial, and agricultural purposes. The Puente Basin is tributary to the main San Gabriel Basin, providing an average of 850 acre-feet/year.
6. The site consists of two parcels of land, one undeveloped and the other containing a single large building and paved appurtenant areas. The undeveloped parcel extends southward from near the building to Arenth Avenue. The former barrel storage and "equipment washdown" areas are on the south side of the building and appear to extend across the common parcel boundary. Waste water treatment and industrial waste clarification occur at the western side of the building and additional barrel storage exist(ed) on the eastern side of the building and at various locations on the peripheral paving.
7. The Board was informed of soil and water contamination at the site on October 20, 1986, when a "Site Assessment Evaluation and Proposed Remedial Action Plan" report was received by staff. It indicated that soil and ground water contamination had been encountered during a pre-purchase investigation (Dames and Moore report entitled "Preliminary Site Assessment - The Monadnock Company Site, 18301 E. Arenth St., City of Industry", dated August 15, 1986).
8. The observed soil contaminants included petroleum hydrocarbons, trichloroethylene (TCE), tetrachloroethylene (PCE), 1,1,1-trichloroethane (1,1,1-TCA), 1,1,2-trichloroethane (1,1,2-TCA), cadmium, lead, zinc, and cyanide. Ground water underlying the soil contamination was found to contain TCE, PCE, and 1,1-dichloroethylene (1,1-DCE) in concentrations exceeding the Department of Health Services Action Levels. For example, soil contained PCE at levels as

great as 590 mg/kg, TCE at 1.8 mg/kg and 1,1,1 TCA at 12 mg/kg. Ground water contained PCE to 960 ug/l, TCE at 1000 ug/kg and 1,1,1-TCA to 530 ug/l. Action levels for these compounds are 5, 5 and 200 ug/l in water respectively.

9. Section 13304 of the California Water Code states, in part, that: "Any person....who has caused or permitted....any waste to be discharged or deposited where it is, or probably will be, discharged into the waters of the state and creates, or threatens to create, a condition of pollution or nuisance, shall upon order of the Regional Board clean up such waste or abate the effects thereof or, in the case of threatened pollution or nuisance, take other necessary remedial action."
10. The discharge of wastes at the Monadnock site has caused a condition of pollution in the underlying body of ground water.
11. This enforcement action is being taken to enforce a general standard and as such is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, Section 21000, et. seq.) in accordance with Section 15321, Chapter 3, Title 14, California Administrative Code.
12. On November 21, 1986, Board staff sent a letter to Mr. Charles Miller of "Old Monadnock Company" requesting a comprehensive workplan to determine the lateral and vertical extent of soil and ground water contamination. A letter workplan was received on January 14, 1987, reviewed and found to be incomplete. Addenda were requested. Although a written report received by the Board on June 24, 1987, entitled "Second Supplement to Site Assessment Evaluation and Proposed Remedial Action Plan" described work performed, it did not include a comprehensive workplan.
13. A deep monitoring well was constructed in February 1988. A report was received in June 1988 partially fulfilling several requirements of the Cleanup and Abatement Order 88-057 issued on May 12, 1988:
 - a) An underlying saturated zone was determined to be contaminated,
 - b) Hydraulic connectivity appears to exist between the uppermost fine-grained saturated unit and an underlying coarser grained unit,
 - c) Vertical extent of contamination was traced from the phreatic surface to Puente bedrock (more than 90 feet below grade).

14. A revised workplan for comprehensive assessment, received June 28, 1988, was reviewed and determined to not be acceptable. Additional delineation of the extent of contamination in the 1986 excavation of a former barrel storage area was received in March 1989 and additional excavation and removal approved. Verification sampling was performed in April 1989. The threat of continued infiltration from the 1986 excavation in the old barrel storage area has been eliminated, fulfilling a requirement of the Order. A workplan to perform refilling and capping was received on August 15, 1989. The issue of anomalous ground water contamination in monitoring well MW-3 downgradient of the undeveloped parcel remains, although soil samples from a large stockpile on the parcel, immediately upgradient, have been found to be uncontaminated (September 13, 1989). Additional investigation is required.
15. The issue of determining other on-site sources has not been adequately addressed. Work plans provided to date have considered as a source only a single former barrel storage area, also stated to have been used to "wash down equipment" during the initial move-in. Additional work is required to determine full extent of contamination.

IT IS HEREBY ORDERED, that the Cleanup and Abatement Order issued May 12, 1989 is revised and, pursuant to California Water Code 13304, that the dischargers shall:

1. Cleanup and abate the soil and ground water contamination at and emanating from the Monadnock site at 18301 East Arenth Avenue in the City of Industry.
2. Perform investigative work to define the full extent of contamination in soil or unconsolidated material and ground water resulting from past disposal practices at the subject facility.
3. Submit to the Regional Board a signed statement identifying which parties will be responsible for the tasks set forth in this Amended Order.
4. Provide to the Board, for review and approval, an acceptable systematic workplan to perform a formal site audit, which will determine past and present use, storage, and disposal of chemicals.

5. Provide to the Board for review and approval, an acceptable systematic workplan to determine any other contamination sources in the vadose zone on-site and evaluate threat to ground water from residual contamination. These other sources should include the clarifier and associated internal piping, piping from the clarifier to the industrial waste sewer on Arenth Avenue, any former sewerage practices prior to construction of Arenth Avenue, former vapor degreasers and associated floor drains, heat treating and associated sumps and piping, plating and associated sumps and piping, external overflow basins, "trenches", tanks and all former barrel storage areas. Possible on-site sources for anomalous ground water contamination in monitoring well MW-3 must be investigated.
6. Provide to the Board for review and approval an acceptable systematic workplan to assess on-site ground water contamination:
 - a. Specify aquifer characteristics for all saturated zones.
 - b. Evaluate hydraulic connectivity existing between all saturated units.
 - c. Delineate lateral extent of on-site water contamination in all saturated zones.
 - d. Prepare a ground water monitoring and testing schedule.
7. Provide to the Board, for review and approval, an acceptable systematic workplan to assess off-site ground water contamination which specifically addresses:
 - a. Off-site lateral and longitudinal extent of contamination in all units.
 - b. Downgradient vertical extent of site-derived contamination.
 - c. Hydraulic relationship of uppermost saturated units to San Jose Creek and potential for surface water contamination.
8. Provide to the Board, for review and approval, an acceptable systematic workplan for remediating any additional contamination of on-site soils and unconsolidated materials.
9. Provide to the Board, for review and approval, phased workplans to remediate on-site and off-site ground water contamination which specifically address the following:
 - a. Alternatives for remediation and analysis.


- b. Adequate technical support for the preferred alternative.
 - c. Detailed description of the preferred alternative as related to existing flow system and contaminant transport mechanism(s).
10. Perform the foregoing according to the following time schedule:

ACTION	RAP OR WORKPLAN (assessment or cleanup)	REPORT (after plan approval)
a. Identification of responsibilities		10/30/89
b. Site audit	10/30/89	(8 weeks)
c. Other contamination sources assessment	10/30/89	(12 weeks)
d. On-site assessment of ground water contamination	11/13/89	(12 weeks)
e. Off-site assessment of ground water contamination	11/30/89	(6 Mnths)
f. Remediation for any remaining contaminated soils and unconsolidated material	4/30/90	(9 Mnths)
g. Remediation for on-site and off-site contaminated ground water	6/20/90	(12 Mnths)

11. Provide to the Board advance notice of any planned physical alterations to the facility or planned changes in the facility's activities that may affect compliance with this order.
12. Provide to the Board advance notice of any planned change in name, ownership, or control of the facilities; provide notice to any succeeding owner or operator of the existence of this Order by letter; forward a copy of such notification to the Board.

13. Submit to the Board monthly progress reports until completion of all Board mandated work. These reports shall be submitted by the fifteenth day of the following month following the reporting period. For example, the report for October 1989 is due by November 15, 1989. This order may be revised by the Regional Board through its Executive Officer as additional information from the assessment(s) becomes available. The authority of the Regional Board, as contained in the California Water Code, to order investigation and cleanup additional to that described herein, is in no way limited by this order. Failure to comply with the terms or conditions of this order may result in imposition of civil liabilities, either administratively by the Regional Board or judicially by the Superior Court in accordance with Section 13350, et seq., of the California Water Code, and/or referral to the Attorney General of the State of California for such action as he may deem appropriate.

Ordered by:


for ROBERT P. GHIRELLI, D.Env.
Executive Officer

Dated: 9/29/89